

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : CRIMINAL NO. _____

v. : DATE FILED: _____

CURTIS WARREN KOEHLER : VIOLATION: 21 U.S.C. § 841(a)(1)
(Distribution of cocaine base
("crack") - 7 counts)
21 U.S.C. § 860(a)
(Distribution of cocaine base
("crack") within 1,000 feet of
a school - 7 counts)
21 U.S.C. § 853
(Notice of criminal

forfeiture)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about August 5, 2002, at Allentown, in the Eastern District of
Pennsylvania, defendant

CURTIS WARREN KOEHLER

knowingly and intentionally distributed approximately 1.4 grams of a mixture or substance
containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 5, 2002, at Allentown, in the Eastern District of
Pennsylvania, defendant

CURTIS WARREN KOEHLER

knowingly and intentionally distributed approximately 1.4 grams of a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, within 1,000 feet of the real property comprising the Harrison-Morton Middle School, a public secondary school located at 127 North Second Street, Allentown, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 21, United States Code, Section 860(a).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 28, 2002, at Allentown, in the Eastern District of
Pennsylvania, defendant

CURTIS WARREN KOEHLER

knowingly and intentionally distributed more than five grams, that is approximately 5.7 grams,
of a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule
II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 28, 2002, at Allentown, in the Eastern District of
Pennsylvania, defendant

CURTIS WARREN KOEHLER

knowingly and intentionally distributed more than five grams, that is approximately 5.7 grams,
of a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule
II controlled substance, within 1,000 feet of the real property comprising the Harrison-Morton
Middle School, a public secondary school located at 127 North Second Street, Allentown,
Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 21, United States Code, Section 860(a).

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 30, 2002, at Allentown, in the Eastern District of
Pennsylvania, defendant

CURTIS WARREN KOEHLER

knowingly and intentionally distributed more than five grams, that is approximately 8.7 grams,
of a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule
II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 30, 2002, at Allentown, in the Eastern District of Pennsylvania, defendant

CURTIS WARREN KOEHLER

knowingly and intentionally distributed more than five grams, that is approximately 8.7 grams, of a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, within 1,000 feet of the real property comprising the Harrison-Morton Middle School, a public secondary school located at 127 North Second Street, Allentown, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 21, United States Code, Section 860(a).

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 12, 2002, at Allentown, in the Eastern District of
Pennsylvania, defendant

CURTIS WARREN KOEHLER

knowingly and intentionally distributed more than five grams, that is approximately 7.0 grams,
of a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule
II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 12, 2002, at Allentown, in the Eastern District of Pennsylvania, defendant

CURTIS WARREN KOEHLER

knowingly and intentionally distributed more than five grams, that is approximately 7.0 grams, of a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, within 1,000 feet of the real property comprising the Harrison-Morton Middle School, a public secondary school located at 127 North Second Street, Allentown, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 21, United States Code, Section 860(a).

COUNT NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 8, 2002, at Allentown, in the Eastern District of
Pennsylvania, defendant

CURTIS WARREN KOEHLER

knowingly and intentionally distributed more than five grams, that is approximately 12.7 grams,
of a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule
II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT TEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 8, 2002, at Allentown, in the Eastern District of
Pennsylvania, defendant

CURTIS WARREN KOEHLER

knowingly and intentionally distributed more than five grams, that is approximately 12.7 grams,
of a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule
II controlled substance, within 1,000 feet of the real property comprising the Harrison-Morton
Middle School, a public secondary school located at 127 North Second Street, Allentown,
Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 21, United States Code, Section 860(a).

COUNT ELEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 24, 2002, at Allentown, in the Eastern District of
Pennsylvania, defendant

CURTIS WARREN KOEHLER

knowingly and intentionally distributed more than five grams, that is approximately 12.5 grams,
of a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule
II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT TWELVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 24, 2002, at Allentown, in the Eastern District of
Pennsylvania, defendant

CURTIS WARREN KOEHLER

knowingly and intentionally distributed more than five grams, that is approximately 12.5 grams,
of a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule
II controlled substance, within 1,000 feet of the real property comprising the Harrison-Morton
Middle School, a public secondary school located at 127 North Second Street, Allentown,
Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 21, United States Code, Section 860(a).

COUNT THIRTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 22, 2002, at Allentown, in the Eastern District of
Pennsylvania, defendant

CURTIS WARREN KOEHLER

knowingly and intentionally distributed more than five grams, that is approximately 27.4 grams,
of a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule
II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT FOURTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 22, 2002, at Allentown, in the Eastern District of Pennsylvania, defendant

CURTIS WARREN KOEHLER

knowingly and intentionally distributed more than five grams, that is approximately 27.4 grams, of a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, within 1,000 feet of the real property comprising the Harrison-Morton Middle School, a public secondary school located at 127 North Second Street, Allentown, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 21, United States Code, Section 860(a).

NOTICE OF CRIMINAL FORFEITURE

1. As a result of the violations of Title 21, United States Code, Sections 841(a)(1) and 860, charged in this indictment including, but not limited to, the violations set forth in Counts One through Fourteen of this indictment, defendant

CURTIS WARREN KOEHLER,

shall forfeit to the United States of America pursuant to Title 21, United States Code, Section 853, the following property:

(A) Any property which defendant used in any manner or part to facilitate the commission of the violations of Title 21, United States Code as charged in Counts One through Fourteen of this Indictment; and

(B) Any property, including but not limited to the sum of \$4,800, which constitutes and/or is derived from proceeds obtained directly or indirectly as the result of the violations of Title 21, United States Code as charged in Counts One through Fourteen of this Indictment.

2. If any of the property described above as being subject to forfeiture, as a result of any act or omission of defendants:

- (1) cannot be located upon the exercise of due diligence;
 - (2) has been transferred or sold to, or deposited with, a third party;
 - (3) has been placed beyond the jurisdiction of the court;
 - (4) has been substantially diminished in value; or
 - (5) has been commingled with other property
- which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) to seek forfeiture of any other property of said defendant.

All pursuant to Title 21, United States Code, Section 853.

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney